

PLAINTIFFS' OPPOSED MOTION FOR AN INTERIM PROTECTIVE ORDER

So as not to give Apple an excuse to delay venue related discovery, Uniloc requests that this Court enter the Attached Interim Protective Order, which would allow a party to designate as “CONFIDENTIAL” any personal information of an Apple (or Uniloc) employee or any other confidential or proprietary information of the party.

The order would bar the recipient from disclosing that CONFIDENTIAL information to anyone other than outside counsel of record, and limit the use of that information to use for purposes of these actions.

The requested order is styled as interim, because it is expected to be superseded by a later protective order governing other aspects of discovery in this action, including source code, which may take a while to resolve.

Dated: August 16, 2018

Respectfully submitted,

/s/ James J. Foster

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ATTORNEYS FOR THE PLAINTIFFS

CERTIFICATE OF CONFERENCE

A conference was held on August 10, 2018 between James J. Foster and John Guaragna, but they were unable to reach agreement because of a dispute whether this order should be held up to await agreement on other issues.

/s/ James J. Foster

CERTIFICATE OF SERVICE

I certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on August 16, 2018.

/s/ James J. Foster